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RECORDS AND REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.

DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for Generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, physical collocation.

DOCKET NO. 990321-TP

FILED: January 6, 2000

NOTICE OF SERVICE OF ANSWERS OF SUPRA TELECOMMUNICATIONS & INFORMATION SYSTEMS, INC. TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-3)

NOTICE IS HEREBY GIVEN that a true and correct copy of the Answers of Supra Telecommunications & Information Systems, Inc. to Staff's First Set of Interrogatories (Nos. 1-3) were furnished by hand delivery to Ms. Beth Keating, Staff Counsel, Florida Public Service Commission, Gerald L. Gunter Building, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850, on January 7, 2000. The original and one copy of this Notice were also furnished by hand delivery on January 7, 2000, to the Director of the Division of Records and Reporting, Florida Public Service Commission. Service copies were furnished by United States mail to all parties of record shown on the attached Certificate of Service.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

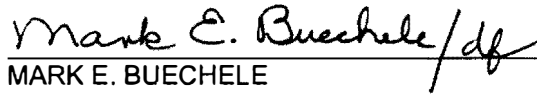
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physical collocation. ) FILED: January 7, 2000

**ANSWERS OF SUPRA TELECOMMUNICATIONS & INFORMATION  
SYSTEMS, INC. TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-3)**

Pursuant to Rule 1.340, Florida Rules of Civil Procedure, Supra Telecommunications & Information Systems, Inc. ("Supra"), by and through its undersigned attorney, hereby serves its Answers to Staff's First Set of Interrogatories (Nos. 1 through 3) to the Staff of the Florida Public Service Commission.

RESPECTFULLY SUBMITTED,



MARK E. BUECHELE  
FLORIDA BAR NO. 906700  
Supra Telecommunications & Information Systems, Inc.  
2620 SW 27<sup>th</sup> Avenue  
Miami, Florida 33133  
(305) 476-4230

**INTERROGATORY 1:**

Referring to Supra witness Nilson's direct testimony, page 13, line 7, and page 14, line 7, please clarify when Supra believes an ILEC should be required to respond to an ALEC's initial application for collocation space. In your response, please explain why the response time identified is appropriate.

**ANSWER:**

*Re. Page 13, Line 7.* The most appropriate time for an ILEC to deliver a detailed price quotation of collocation costs is during the response interval ending thirty days after the application. This would demonstrate to the ALEC that the quoted dollars represent specific construction activity, which can be identified and checked for errors or other unnecessary work. If an error occurs in the understanding of the collocation application, the ALEC, prior to making a Firm Order Commitment (FOC), has at this point a last chance to catch the error before Space Acceptance occurs some 90+ days later and after both companies have spent considerable monies. Catching problems before they occur is good business because it lowers costs, and eliminates customer dissatisfaction, which is what we all strive for. The detailed information provided should be the basis for, and should otherwise be used to calculate the total price quotation. The detailed information should be delivered to the ALEC along with the total cost.

Asking an ILEC to provide this information within thirty days is not unreasonable because other ILECs already engage in this practice. For example Southwestern Bell submits to an ALEC, at the time of collocation acceptance, a one-page collocation costs summary containing thirty line-item details with their non-recurring and monthly recurring costs. Backing this up is an eight-page detailed document listing over 183 line-item details, followed by individual lines for each ICB amount charged. The prices are pre-printed on the form.

In contrast, BellSouth only provides an ALEC three line items of detail upon collocation acceptance and there is no official mechanism for obtaining a more detailed breakdown of charges that often exceed a staggering one-quarter of a million dollars. This practice is wrong

because it causes distrust of competitive providers, while increasing mistakes and raising costs which must ultimately be passed on to consumers.

It has been Supra's experience on recent quotes that BellSouth's quotations have been found to contain overcharges, unnecessary charges, double charges and inaccurate calculations of the final amount. Requiring the ILEC to present all this information up-front within the thirty-day response interval will allow the ALEC to catch these problems. Moreover, any quote provided needs to be based in fact and not in speculation. If a quote is already being provided within thirty days, in theory the detailed breakdown comprising that quote must already exist. If a detailed breakdown does not exist, then the quote is not real and the ILEC has not taken the time to prepare a real quote as otherwise required.

There are numerous points in the pricing of a collocation application where miscommunication can lead to a costly error. Examples of this can be the provisioning of circuits, equipment or infrastructure not requested by the ALEC, non-recurring charges quoted that are not applicable by the ALEC's interconnection agreement or by a Public Service Commission order. The detailed price quotation is no different than an equipment invoice or a cash register receipt. Each shows cost per line-item rather than a total dollar amount.

The detailed quotation should be incorporated in the quotation estimating process and supplied to the ALEC during the thirty-day application response interval. This is consistent with both Southwestern Bell and Sprint-Florida. It is reasonable to expect this from all ILECs.

*Re. Page 14, Line 7.* If the ALEC desires to subcontract portions of the collocation space construction, per ILEC specifications and drawings, then the ILEC actually has less work to do. The quotation and vendor selection for portions of the job are no longer a requirement to approve the collocation application and prepare a price quote. The ALEC has assumed responsibility for this portion of the job.

However, to eliminate disputes over the correct response interval for various combinations, the response interval should be maintained at the current thirty calendar days. There is, of course, no reason for the ILEC not to notify the ALEC sooner if the work is completed in a shorter period of time.

**INTERROGATORY 2:**

Please explain, in detail, whether it is necessary for an ALEC to submit an application if the ALEC wishes to convert from virtual collocation to physical collocation.

**ANSWER:**

There are really two parts to this question: (a) is it necessary for an ALEC to submit a new application, and (b) is it allowable for the ILEC to charge an additional \$3,850 application fee to make that change.

In its simplest case, a conversion from virtual to cageless physical collocation, both companies have to make record changes and assign or remove responsibility for the affected equipment. In this case it makes sense to have a simplified form, rather than a full application, for the ALEC to request the change and to document all information required for a smooth transition of responsibility. The current application fee is not required or justified in this case because no real work is being provided by the ILEC.

We endorse the concept used by Sprint–Florida in this respect. Their position is that virtual and cageless physical collocation are the same, have the same provisioning intervals, and same collocation charges. They differ only in who maintains the equipment.

Conversely, a large-scale conversion, which involves the moving of equipment and the creation of new caged or walled space, should be processed with a new application and therefore may warrant an accompanying fee.

**INTERROGATORY 3:**

Please identify what potential problems, if any, could occur when any changes, including conversions from virtual to physical collocation, are made to existing collocation space. For each problem identified, please explain what effect, if any, the problem might have on the response and implementation intervals for the proposed changes.

**ANSWER:**

Converting virtual collocation to cageless physical collocation includes the potential that human beings, shifting responsibility for maintenance of a piece of equipment from one company to another, could fail to properly do that job. This would most likely be due to incorrect instructions having been issued. The Network Operations Center would likely have issued the maintenance request to the non-responding department, and any problems that occur should have high visibility and be capable of being escalated.

For example, with electronic card readers, rather than key access to the central office, an ALEC may find itself in a situation where the ILEC is no longer maintaining the ALEC equipment, but the ALEC does not have security access to the building. A change from virtual to cageless physical collocation should have a limited effect and, therefore, should qualify for a reduced response and implementation interval.

For more large scale conversions, conversions that involve moving or temporarily disconnecting equipment, the potential for problems is more well known. It would make sense that this scenario more nearly emulates the potential risk in "cutting-over" customers from an old switch to a newer one. The moving of in-service, virtually collocated equipment to a caged or walled physical collocation should be approached from an add-disconnect-remove approach rather than moving in-service equipment. This is a service model that all ILECs are very familiar with as they have upgraded to modern digital switches. This type of conversion should have response and implementation intervals consistent with caged or walled physical collocation, although the process must be modified after the new collocation space is operational to remove the old equipment.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of the Notice of Service and Answers of Supra Telecommunications & Information Systems, Inc.'s ("Supra") to Staff's First Set of Interrogatories (Nos. 1 through 3) have been served by hand delivery upon Ms. Beth Keating, Staff Counsel, Gerald L. Gunter Building, 2540 Shumard Oak Boulevard, Tallahassee, Fl., 32399-0850, on behalf of the Florida Public Service Commission; and that a true and correct copy thereof has been furnished by U.S. Mail, this 7th day of January, 2000, to the following parties of record:

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c/o Ms. Beverly Y. Menard  
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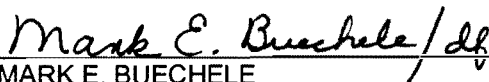
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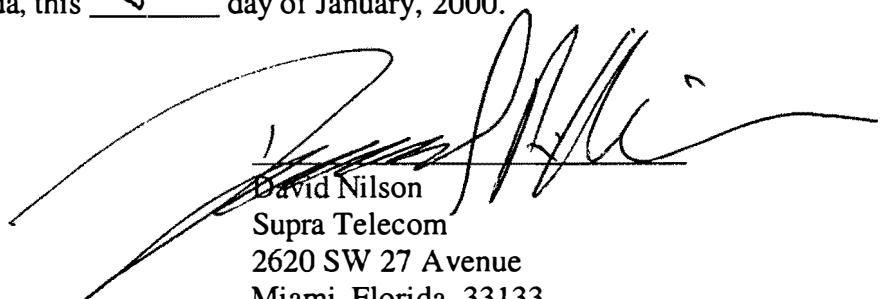
**AFFIDAVIT**

**STATE OF FLORIDA :**

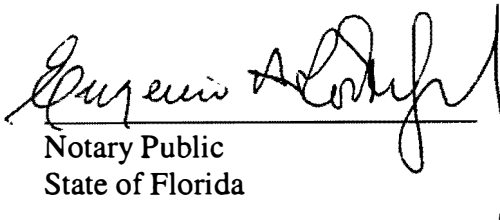
**COUNTY OF DATE :**

**BEFORE ME**, the undersigned authority, personally appeared DAVID NILSON, the Chief Technology Officer for Supra Telecom, who deposed and stated that the answers to the First Set of Interrogatories (Nos. 1-3), served on Supra Telecom by the Florida PSC Staff in Docket No. 981834-TP, were prepared by him and that the responses contained therein are true and correct to the best of his knowledge and belief.

**DATED** at Miami, Florida, this   7<sup>th</sup>   day of January, 2000.

  
David Nilson  
Supra Telecom  
2620 SW 27 Avenue  
Miami, Florida 33133  
305-443-3710

Sworn to and subscribed before me this   7<sup>th</sup>   day of January, 2000.

  
Notary Public  
State of Florida

My Commission Expires:

